

1 contour maps and some things might have been located  
2 in the engineering department. But I believe that from  
3 my direct testimony the Pacifica Foundation really  
4 oversaw, they held the license to five stations.

5 Q Where was the Pacifica Foundation located?

6 A Located next door to the station.

7 Q Did you have any responsibility or  
8 familiarity with working with programming issues  
9 lists?

10 A No, not at KPFA.

11 Q Who was responsible for doing that?

12 A I don't really recall. It might have been  
13 the Assistant General Manager. I actually had an  
14 assistant there.

15 Q And you were responsible for overseeing  
16 the work of the assistant GM?

17 A Yes. He assisted me quite a bit briefing  
18 me on things at KPFA.

19 Q And so were you familiar that he did in  
20 fact have responsibility for doing the programs issues  
21 lists?

22 A To the best of my understanding and what  
23 I can recall, I'm sure he assisted the Pacifica  
24 Foundation in keeping their public inspection file up  
25 to date.

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1 Q And you were hired as a contract employee,  
2 isn't that right?

3 A I was under a contract. Yes, I was.

4 Q And what was the length of the contract?

5 A Well, was it an annual contracts for each  
6 station manager? I guess it was an annual contract  
7 for each station manager.

8 Q So your first contract would have run from  
9 -- when did you start at KPFA?

10 A I believe it was mid-January 1998.

11 Q And so if it were an annual, it would have  
12 run to mid-January 1999?

13 A I believe so.

14 Q Okay. And then you were on another annual  
15 contract to 2000?

16 A I think at that time they were in the  
17 process of extending contracts on a monthly basis.

18 Q What time period they extending monthly  
19 contracts?

20 A I believe that started in 1999.

21 Q Okay. So you were under an annual  
22 contract in January and then they renewed that on a  
23 monthly basis to February and then again in March and  
24 so on and so forth throughout the year? That must  
25 have been very stressful, not knowing month-to-month

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1       whether your contract would be renewed, I would  
2       expect, wasn't it?

3               A       With all due respect, Pacifica's kind of  
4       stressful.

5                       (Laughter.)

6               BY MS. LEAVITT:

7               Q       Is there any specific reason why it is  
8       that way?

9                       JUDGE SIPPEL:   Do we have to know that?  
10       Let's go to something else.

11               MS. LEAVITT:   Okay, Your Honor.

12               BY MS. LEAVITT:

13               Q       Did there come a time when your contract  
14       was not renewed?

15               A       Yes, there did.

16               Q       When was that?

17               A       March 30, 1999.

18               Q       Why wasn't it renewed?

19               A       I believe the Executive Director made that  
20       decision.

21               Q       And who was that?

22               A       Her name is Lynn Chadwick.

23               Q       And what reason did she give you for not  
24       renewing your contract?

25               A       Well, when she came in and spoke with me

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1 directly, she only said we want to take it in a new  
2 direction. You have two hours to get your things out.

3 Q And this was at the end of March?

4 A This was March 30, 1999.

5 Q Almost at like to the end of the -- the  
6 last day of your contract she told you it wasn't going  
7 to be renewed for the following month?

8 A I had two hours to get my things out,  
9 meaning that it would be at close of business, 5:00.  
10 So I guess if we work backwards, that was 3:00 p.m.  
11 Pacific Standard Time.

12 Q Had they indicated prior to that time that  
13 they were not going to renew your contract?

14 A No. I had no indication whatsoever.

15 Q That must have really been a shock. Just  
16 hearing "get your things out in 2 hours" is very  
17 stressful. And you had mentioned that this was a  
18 stressful situation.

19 What did you do after you left that  
20 station?

21 MR. PRICE: Objection to form. After all  
22 that narrative, just move on to the questions.

23 MS. LEAVITT: Okay.

24 BY MS. LEAVITT:

25 Q What did you do after you left KPFA?

1 A You mean that day or what?

2 Q Well, did you start a new job?

3 A Not right away.

4 Q Okay. When did you start a new job?

5 A I believe it was about ten months after I  
6 had lost my job at KPFA.

7 Q So that would have been December of '99?

8 A I can't be sure. My unemployment ran out.  
9 I had been looking for work the whole time.

10 Q Okay.

11 A I found a job.

12 Q And you filed a wrongful termination suit,  
13 didn't you?

14 A I did.

15 Q And you had taken a deposition in relation  
16 to that suit, hadn't you?

17 A I did.

18 Q And do you recall when you were deposed?

19 A No, I do not.

20 Q Okay. And when you did find a new job  
21 where was that and when?

22 A That was at an organization, a nonprofit  
23 media organization called Pacific News Service, not to  
24 be confused with Pacifica. And I'm not exactly sure  
25 what the date was that I was hired.

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1 Q Okay. It was in 1999, though?

2 A Yes.

3 Q Okay. And what was your title?

4 A Media Consultant.

5 Q And what did you do as a Media Consultant?

6 A Various things. I worked with the ethnic  
7 media. They had a group attached to it called New  
8 California Media, which is a consortium of about 300  
9 to 400 ethnic language newspapers. They also published  
10 a magazine called *YO! Youth Outlook*.

11 Pacific News Service also works with  
12 incarcerated youth and they publish a monthly digest,  
13 if you will, of the writing that goes on as they work  
14 with incarcerated youth. And this is called *The Beat*  
15 *Within*.

16 And I also moderated candidates forums and  
17 different ethnic news briefings with persons of  
18 stature in the city and county of San Francisco.

19 Q And did you have any interaction with  
20 radio stations?

21 A I did -- I hosted a little show called *The*  
22 *Eccentrics*. And that was born out of Pacific News  
23 Service.

24 Q Did Pacific News Service sell its services  
25 to radio stations?

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1           A       It actually deals more with print. It's  
2       what's known as a wire service organization.

3           Q       Does New California Media provide news to  
4       KALW now?

5           A       They're one of our collaborating partners.

6           Q       And when did they become a collaborating  
7       partner?

8           A       They're actually one of the groups I  
9       collaborated with first on making programming when I  
10      became Station Manager at KALW.

11          Q       And when did you leave Pacific News  
12      Service?

13          A       I left Pacific News Service in February,  
14      about mid-February 2001.

15          Q       And how was it that you came to leave that  
16      station? Where did you go after you left Pacific News  
17      Service, rather?

18          A       So which question --

19          Q       I'm sorry. That is confusing. I'm sorry.  
20                    When you left Pacific News Service who was  
21      your next employer?

22          A       San Francisco Unified School District.

23          Q       As General Manager for KALW, right?

24          A       That is correct.

25          Q       How did you find out about the General

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1 Manager position?

2 A Bill Helgeson called me.

3 Q And when did he call you?

4 A Sometimes I measure things by what was  
5 going on. And we had an election cycle coming up in  
6 San Francisco. We had just gone back to district  
7 elections and I was moderating probably 15 forums for  
8 Supervisor at that time. And that would be in the  
9 fall, it was leading up to November, so I think Mr.  
10 Helgeson might have called me in August leading up to  
11 those forums. That's sometimes how I match things up.

12 JUDGE SIPPEL: August of what year?

13 THE WITNESS: I guess that would have been  
14 2000.

15 BY MS. LEAVITT:

16 Q And was this the first time you had heard  
17 from him since you had visited the station KALW in  
18 1997?

19 A Yes.

20 Q Do you know how he knew how to get in  
21 contact with you?

22 A I'm listed.

23 Q Okay. And you had indicated, I think,  
24 that he called Mr. Ramirez and gotten a recommendation  
25 from Mr. Ramirez.

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1 MR. PRICE: Objection.

2 JUDGE SIPPEL: Sustained.

3 You could ask the witness whether she  
4 knows why Mr. Helgeson called her, what factors Mr.  
5 Helgeson took in, if she knows.

6 MS. LEAVITT: Okay.

7 BY MS. LEAVITT:

8 Q Do you know why Mr. Helgeson called you?

9 A When Mr. Helgeson called me he told me  
10 that Jeff Ramirez had -- had encouraged him to call me  
11 and see if I was interested to reenter public radio.

12 Q And what was your response?

13 A I'll think about it.

14 Q And did there come a time when you filled  
15 out an application?

16 A Yes. Mr. Helgeson had told me, well,  
17 after you think about it if you want to see the job  
18 description, it's posted on the SFUSD website.

19 MS. LEAVITT: Your Honor, I'd like to mark  
20 as EB Exhibit -- I think we're up to number 60.

21 JUDGE SIPPEL: Can you tell me generally  
22 what it is as you're handing it out?

23 MS. LEAVITT: Yes, Your Honor. This is  
24 the General Manager job description that was provided  
25 in one of SFUSD's exhibits, 43 pages 135 to 137. It's

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1 a three page document.

2 MR. PRICE: It's part of SFUSD 43?

3 MS. LEAVITT: Yes, it was. It was part of  
4 the CD. There was a CD, I believe. No, this wasn't a  
5 CD. There were --

6 MR. PRICE: Okay.

7 MR. SHOOK: Was it printed out in the  
8 document she has in front of her, I guess, is my  
9 question before we go through this process?

10 MS. LEAVITT: No. Not it was not. It was  
11 part of a discovery request.

12 MR. PRICE: Your Honor, I'm just wondering  
13 if it's already in the binder she has before we mark  
14 a new document.

15 JUDGE SIPPEL: Let's go off for a second.  
16 Let's go off the record.

17 (Whereupon, at 4:55 p.m. off the record  
18 until 4:56 p.m.)

19 MR. SHOOK: Your Honor, when the Bureau  
20 received the San Francisco Unified School District's  
21 objections and responses to Enforcement Bureau's first  
22 request for production of documents, which is EB  
23 Exhibit 43 there was a series of documents that was  
24 given to us at that time. And those documents  
25 included this job description, and they were Bates

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1 stamped number SFUSD 00135 through SFUSD 00137. So  
2 that's how the Bureau came into possession of this  
3 document. That's the source of the document.

4 JUDGE SIPPEL: All right. And the purpose  
5 for the use of the document as an exhibit at this  
6 point?

7 MS. LEAVITT: Yes, Your Honor.

8 JUDGE SIPPEL: Why? What were you going  
9 to do with this document now?

10 MS. LEAVITT: I'd like to go over some of  
11 the job descriptions of the General Manager of KALW  
12 effective August 18, 2000.

13 JUDGE SIPPEL: Well, couldn't you just ask  
14 her whether or not -- I mean, you could just read off  
15 what the requirements of the job are in that document  
16 and see if she agrees with that.

17 MS. LEAVITT: Okay.

18 JUDGE SIPPEL: Do you have any objections  
19 to that?

20 MR. PRICE: No. I mean if she's going to  
21 introduce the document, I can have her say she's seen  
22 it or something. But if she wants to read do you  
23 understand these to be the description, that's fine.  
24 Much more --

25 JUDGE SIPPEL: That's what you want you

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1 wanted to get to, right?

2 MS. LEAVITT: Yes. Okay. Yes, Your  
3 Honor.

4 JUDGE SIPPEL: All right. Just tick them  
5 off and see if she can identify them or acknowledge  
6 them, or recognize them, remember them.

7 MS. LEAVITT: Okay. Thank you.

8 JUDGE SIPPEL: Do you understand where  
9 we're going?

10 MR. PRICE: Can we first identify that she  
11 saw --

12 THE WITNESS: I think so, Your Honor.

13 MS. LEAVITT: You are going to read  
14 through the job description. You will say --

15 JUDGE SIPPEL: Wait a minute. She's going  
16 to ask you questions about the job description with  
17 respect to whether or not this is what you recall the  
18 job description calling for these particular  
19 qualifications. That's all. She's going to ask you.

20 If it becomes a problem, we'll have you  
21 then look at the problem. I'm hoping that maybe these  
22 are not a problem.

23 MR. SHOOK: Your Honor, past procedure has  
24 been simply to allow the witness to see the document  
25 in the first instance to be able to read along. I

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1 think it's just much easier that way.

2 JUDGE SIPPEL: All right.

3 Again, I don't see any reason to put this  
4 in as an exhibit.

5 THE WITNESS: Okay. I have the exhibit in  
6 front of me.

7 JUDGE SIPPEL: All right. And this is the  
8 job description that you were given or that you had  
9 access to? This is while you were considering the  
10 position, right?

11 THE WITNESS: This is what I assume was  
12 posted on the website.

13 JUDGE SIPPEL: All right.

14 THE WITNESS: I didn't have a hard copy  
15 unless I printed it out -- off the website.

16 JUDGE SIPPEL: All right. Does this look  
17 familiar to you?

18 THE WITNESS: To the best of my memory, it  
19 must be what they posted. I didn't review the job  
20 description.

21 JUDGE SIPPEL: Go ahead and ask her the  
22 questions.

23 MS. LEAVITT: Okay.

24 BY MS. LEAVITT:

25 Q The definition of this job was under

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1 general administrative direction of the Chief  
2 Executive Officer. The GM performs difficult and  
3 responsible administrative and management work  
4 pertaining to the operations of KALW, Public Education  
5 Radio station. Was that your understanding of one  
6 aspect of the job?

7 A My understanding is that any General  
8 Manager at most public radio stations do perform  
9 difficult and responsible and management work.

10 Q (Laughter).

11 A So, yes, it is my understanding of the  
12 job.

13 Q Thank you.

14 And was another aspect of your  
15 understanding of the job that you would direct and  
16 manage the administration, operation and programming  
17 of KALW?

18 A Yes.

19 Q And that you had overall management  
20 responsibility for all operational functions and  
21 activities?

22 A Yes.

23 Q That you would direct and assure  
24 implementation and compliance with the FCC regulations  
25 including technical program and operating standards,

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1 EEO policies, public file and public disclosure  
2 requirements and other record keeping and reporting  
3 requirements?

4 MR. PRICE: Objection. You're on the  
5 second page of the document now?

6 MS. LEAVITT: Yes, I am. I'm on the  
7 second page.

8 MR. PRICE: Please direct the witness to  
9 where you're reading from.

10 MS. LEAVITT: I'm sorry.

11 BY MS. LEAVITT:

12 Q It's at the top of page 2 of the document.

13 A I see that under "Directs and Assures."  
14 Yes.

15 Q And farther down on that page "Job Related  
16 and Essential Qualifications." Did you have an  
17 understanding that the GM would be required to have a  
18 knowledge of the principles and practices of  
19 broadcasting management including familiarity with FCC  
20 and I think it's supposed to read and National Public  
21 Radio policies, guidelines and regulations?

22 A Yes, I see that.

23 Q And was that your understanding of what  
24 the position of GM would require?

25 A Yes.

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1 Q Thank you.

2 MS. LEAVITT: Your Honor, I'd like to move  
3 EB Exhibit 60 into evidence at this time.

4 JUDGE SIPPEL: Well, I thought we were not  
5 going to do that. Do we need to do that? All right.  
6 Let's do it.

7 You have copies for the reporter.

8 MR. SHOOK: They were already given to the  
9 reporter, Your Honor.

10 JUDGE SIPPEL: Okay.

11 MS. LEAVITT: Did you need a copy?

12 JUDGE SIPPEL: Is that the right number?

13 MR. SHOOK: I believe it's 60, is the  
14 correct next number, yes.

15 MS. LEAVITT: Did you need a copy, Your  
16 Honor?

17 JUDGE SIPPEL: Yes, I will. You can pass  
18 it up to the court reporter. Thank you.

19 Okay. You've identified what this is.  
20 This is a job description. It's marked for  
21 identification as EB Exhibit 60.

22 (Whereupon, the document was  
23 marked as EB Exhibit 60 for  
24 identification.)

25 Is there any objection to receiving it

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1 into evidence?

2 MR. PRICE: The only objection I would  
3 make on the record, Your Honor, is that the witness  
4 hasn't identified had they seen the document before,  
5 and only portions of it were read to her as part of  
6 the job description.

7 JUDGE SIPPEL: All right. Do you want to  
8 look at the document again, Ms. Sawaya, and tell us if  
9 you have seen it before? Take your time.

10 While you're reading that, the document is  
11 entitled "City and County of San Francisco, Department  
12 of Human Resources, Job Code Title General Manager,  
13 KALW," etcetera.

14 THE WITNESS: Again, sir, with all due  
15 respect, while I don't have a precise recollection  
16 that this exactly the job description that I read on  
17 the website, I completely trust SFUSD that they would  
18 submit what was posted on their website for the  
19 General Manager position of KALW. So I will then  
20 verify that this must have been the job position  
21 posted by SFUSD for the General Manager position at  
22 KALW.

23 JUDGE SIPPEL: That's a unique approach to  
24 reliability.

25 (Laughter).

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1 JUDGE SIPPEL: But I think it's  
2 established quite well.

3 THE WITNESS: Thank you.

4 JUDGE SIPPEL: Any objection? No  
5 objection.

6 MR. SHOOK: I think his thunder was just  
7 stolen.

8 (Laughter).

9 JUDGE SIPPEL: Number 60 is received in  
10 evidence.

11 (Whereupon, the document  
12 previously identified as EB  
13 Exhibit 60 was received in  
14 evidence.)

15 JUDGE SIPPEL: Thank you very much.

16 THE WITNESS: You're welcome.

17 JUDGE SIPPEL: Okay, Ms. Leavitt.

18 MS. LEAVITT: Thank you, Your Honor.

19 BY MS. LEAVITT:

20 Q Now you met with Mr. Helgeson, did you  
21 not, and had coffee with him? Well, let me ask you  
22 this: Did you meet with Mr. Helgeson?

23 MR. PRICE: Objection.

24 JUDGE SIPPEL: What's wrong with that  
25 question?

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1 MR. PRICE: Just at what time did you meet  
2 with Mr. Helgeson.

3 MS. LEAVITT: Okay.

4 JUDGE SIPPEL: I'll sustain the objection.  
5 You go ahead.

6 BY MS. LEAVITT:

7 Q When did you or did you meet with Mr.  
8 Helgeson at anytime during the interview process?

9 A Not during the interview process until he  
10 was on an interview committee.

11 Q Did you meet with him prior to that time?

12 A I did meet with him prior to the interview  
13 process.

14 Q And approximately when was that?

15 A Shortly after I received the phone call  
16 from Mr. Helgeson.

17 Q Okay. And where did you meet?

18 A At a place called -- I'm not sure what  
19 cafe it was, there's so many in San Francisco. But I  
20 believe it was somewhere close to where I live.

21 Q (Laughter.) Okay. And how long was your  
22 meeting with Mr. Helgeson at that coffee shop, if you  
23 will?

24 A Long enough to have a cup of coffee and  
25 him to give me the web address and tell me to look at

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1 the job description, ask me how I was.

2 Q Did you ask him any questions about KALW?

3 A I said how you doing, how is the station  
4 doing. He said fine. That was pretty much it.

5 Q At page 362 of your deposition, which is  
6 EB Exhibit -- or actually it's SFUSD Exhibit --

7 JUDGE SIPPEL: Is that in the binder?

8 MS. LEAVITT: Yes, Your Honor.

9 MR. PRICE: I haven't heard an exhibit  
10 number yet, but it's in the range of the binder.

11 MS. LEAVITT: 18.

12 MR. SHOOK: This is one of those exhibits  
13 where initially we received excerpts and then  
14 ultimately the entire deposition was going to be  
15 submitted.

16 MR. PRICE: I suspect your copy was the  
17 entire deposition, so if you'd give a deposition  
18 number it's probably be the best way to do it.

19 JUDGE SIPPEL: Well, let's see what you're  
20 going to ask and ask the witness to look at the page  
21 that you're referring to.

22 MS. LEAVITT: On page 362, deposition page  
23 number 362.

24 JUDGE SIPPEL: Yes, that's in the binder.  
25 This is the deposition of September 28, 2004 that took

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1 place in San Francisco?

2 MS. LEAVITT: Yes, Your Honor.

3 BY MS. LEAVITT:

4 Q Didn't you ask Mr. Helgeson, you know,  
5 what's going on at the station, is it in an uproar,  
6 what's going on?

7 MR. PRICE: Can you point to a line number  
8 or something?

9 MS. LEAVITT: One and two.

10 MR. PRICE: The witness can refer to the  
11 previous page, 361, if they want to see the question  
12 or read the preface to that mid-sentence that begins  
13 on line one on page 362.

14 THE WITNESS: I did ask about an uproar.  
15 As I state prior to that after my experience of KPFA,  
16 I think that that was a fair question.

17 BY MS. LEAVITT:

18 Q Sure. And what did he respond?

19 A I don't recall exactly. He probably  
20 responded nothing like at KPFA. (Laughter).

21 Q Did he happen to mention the license  
22 challenge?

23 A No, he did not.

24 Q Did he happen to mention the existence of  
25 GGPR, Golden Gate Public Radio?

1 A No, he did not.

2 Q After that meeting with Mr. Helgeson you  
3 mentioned that you had another contact with him during  
4 the committee. Who did you meet with during the  
5 committee?

6 A Well, that was my second interview for the  
7 job.

8 Q Yes.

9 A And Bill was on the committee, or they  
10 called themselves a committee. A woman who comes from  
11 the auditing company that KALW uses for their annual  
12 financial audit in order to complete paperwork for the  
13 Corporation for Public Broadcasting. And there was  
14 another gentleman there, I don't recall his name. He  
15 said he was a broadcaster.

16 Q Do you recall when this meeting occurred?

17 A Well, it happened -- it was the second of  
18 three, I guess, interviews you could call then that I  
19 had. So it must have been sometime between late  
20 summer and fall or late fall. I -- I'm sorry. I can't  
21 pinpoint the exact time.

22 Q That's okay.

23 During that committee interview did anyone  
24 mention the license challenge?

25 A No, they did not.

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1 JUDGE SIPPEL: Can we get through this a  
2 little faster? I mean, I think we want to know when  
3 she was hired.

4 MS. LEAVITT: Yes.

5 JUDGE SIPPEL: And whether she knew about  
6 the Golden Gate Petition.

7 MS. LEAVITT: About the license challenge  
8 and the Petition, yes.

9 JUDGE SIPPEL: Before she was hired?  
10 Right. Isn't that right?

11 MS. LEAVITT: Yes, Your Honor. Yes.

12 BY MS. LEAVITT:

13 Q You had a series of other interviews, is  
14 that correct, Ms. Sawaya?

15 A That's correct.

16 Q And during the course of those interviews  
17 did anybody tell you about the license challenge?

18 A No, they did not.

19 Q Did they tell you about Golden Gate Public  
20 Radio?

21 A No, they did not.

22 Q When were you offered a position at KALW?

23 A After I met with Superintendent Dr. Arlene  
24 Ackerman.

25 Q And when did you meet with her?

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1           A       Probably either the first or second week  
2       in February of 2001.

3           Q       Did she mention the license challenge at  
4       that time?

5           A       No, she did not.

6           Q       Did she mention the Letter of Inquiry at  
7       that time?

8           A       No, she did not.

9           Q       Had you spoken with Mr. Helgeson at the  
10      time that you were offered a position, the GM  
11      position?

12          A       Spoken with him? In what way?

13          Q       Called him, emailed him, met with him?

14          A       I called him to tell him -- excuse me. I  
15      called him and told him that I had scheduled a meeting  
16      with Jackie Wright. And -- and -- and that I had  
17      heard a definite yes or no and was continuing with the  
18      process.

19          Q       And did Mr. Helgeson ever mention anything  
20      about the -- did he contact you in February of 2001?

21          A       I -- I don't remember. I don't think he  
22      did.

23          Q       Did you ever contact him in February of  
24      2001?

25          A       Well -- well, that might have been when I

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1 called him to say I was going to met with Jackie or  
2 Dr. Ackerman, that the process was moving along.

3 Q After the offer was extended do you speak  
4 with Mr. Helgeson?

5 A The offer was extended? Oh, you mean was  
6 given to me?

7 Q Yes.

8 A Oh, I'm sorry. I thought you meant  
9 extended as opposed --

10 Q Oh, no, no. I'm sorry.

11 JUDGE SIPPEL: The other extended.

12 (Laughter).

13 THE WITNESS: Extending to the hand of  
14 opportunity.

15 (Laughter).

16 THE WITNESS: I'm sorry.

17 BY MS. LEAVITT:

18 Q That's okay.

19 A Could you repeat the question.

20 JUDGE SIPPEL: I couldn't -- go ahead.

21 (Laughter).

22 BY MS. LEAVITT:

23 Q After Dr. Ackerman made the offer for the  
24 GM position at KALW did you speak with Mr. Helgeson?

25 A I -- I must have, probably. I cannot be

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1 sure. I had a lot to get done at my other job.

2 Q Okay. Did you speak with Mr. Ramirez at  
3 anytime during the interview process?

4 A No.

5 Q You never called him to thank him for  
6 recommending you for the job?

7 A No, I didn't.

8 Q And when did you start at KALW?

9 A March 1, 2001.

10 Q Did Dr. Ackerman give you any guideline as  
11 to what you would be working on when you first  
12 started?

13 A It was really much more of a who are you,  
14 what's your vision, what's your experience. And Dr.  
15 Ackerman wanted to see a relationship between KALW and  
16 SFUSD, and both of their public service missions. Find  
17 a way to, perhaps, enhance that, especially vis-à-vis  
18 students.

19 Q But she didn't give you any specific  
20 assignments or projects to work on to kind of give you  
21 a heads up as to what you would step into on your  
22 first day?

23 A No. It was a very brief visit, actually,  
24 with Dr. Ackerman.

25 Q What did you know about KALW before you

1 started?

2 A Well, I knew that it was an NPR member  
3 station, that it had a very small signal in the  
4 nation's fifth largest media market, which is a very  
5 competitive media market.

6 I know that it was licensed to the Unified  
7 School District because I had been pushed to the  
8 School District site, and I probably had some thread  
9 of memory from my NPR days about that.

10 I knew it was located in a high school,  
11 but it wasn't the high school my son went to so I  
12 wasn't familiar with that high school.

13 That's about it. And -- oh, I knew that  
14 it called itself Information Radio.

15 Q At page 5 of your direct testimony, which  
16 was T-3, SFUSD Exhibit T-3 page 5, you said that you  
17 weren't familiar with its programming or the  
18 management. Did you do any independent research into  
19 the station?

20 A Oh, here's page 5. I'm sorry. No.

21 Q Did you ever visit the station to look at  
22 the public inspection file?

23 A Before I was hired?

24 Q Yes.

25 A No.